

**REMARKS**

Claims 19, 24, and 34-39 have been amended to improve readability of the claims and to better define that which the Applicant considers to be the invention. Claims 25-33 have been canceled. New Claims 42-46 have been added. Applicant respectfully submits that these amendments do not add new matter. Therefore, claims 19-24 and 34-46 are pending in this application.

**Rejections under 35 U.S.C. § 102**

Claims 19-33 were rejected under 35 U.S.C. 102(b) as being anticipated by Iizuka (U.S. Patent No. 5,508,743). Applicant respectfully traverses this rejection. Applicant submits that many differences exist between the claimed inventions and the disclosure of Iizuka and for the sake of brevity, only some will be discussed below. As will be fully explained, Iizuka does not disclose each and every feature of independent claims 19, 34 as amended and new claim 42 as is required in a section 102 rejection.

Claims 19 and 34 utilize the feature of each region of the plurality of regions being compressed once in the plurality of frames without using interframe compression. Applicant respectfully submits that Iizuka does not disclose or suggest this feature. The cited portions of Iizuka disclose utilizing "agreement disagreement switchover signals" to divide a frame into two regions where one region overlaps another and then dividing each of those regions into blocks. As discussed in column 6, lines 27-41 of Iizuka, the intra-frame switchover signal" is determined by using an OR circuit 107. Therefore, if either one of the agreement/disagreement signal I 17 or agreement/disagreement signal II 18 is an agreement switchover signal then intraframe compression takes place. In this way, Iizuka teaches that the overlapping area (i.e., Area II in Fig. 3 of Iizuka) are refreshed more often than the other area

(i.e., portion of Area I outside of Area II in Fig. 3 of Iizuka) so the more important viewing area (i.e., Area II in Fig. 3 of Iizuka) is refreshed more often. Therefore, as taught by the cited portions of Iizuka, by using the agreement/disagreement switchover signals to generate the intra-frame switchover signal, two separate areas (i.e., Areas I and II) within the same frame are refreshed. The Office is respectfully directed to column 6, lines 45-67 of Iizuka which discusses the operation of the intra-frame/inter-frame switchover signal output circuit:

As shown in FIG. 6, the number of refresh blocks is normally one or two within one frame upon assumption that one frame consists of two areas. However, as shown in a 16th frame of FIG. 7, if the positions of refresh blocks in the respective areas coincide, the number of refresh blocks is less than the number of the areas.

As the refresh blocks shift their positions within the respective areas at a constant period, the smaller one area becomes, the shorter the refreshing period becomes. Further, within an overlapped range, refreshings of two types of periods are performed, the blocks are refreshed more frequently. (Emphasis Added.)

In this manner, the structure of one frame of a moving image signal is regarded as a combination of a plurality of areas possible to be overlapped. By this arrangement, the refresh control in moving image signal coding is kept simple. Further, in this refresh control, the refresh period in a higher-interest range such as the central portion of the frame can be shortened and that in a lower-interest range such as the circumferential portion of the frame can be prolonged so that image quality within the higher-interest range can be improved, and in case of error, restoration can be quickened. (Iizuka, column 6, lines 45-67)

Therefore, Iizuka teaches the refreshing of multiple regions in each frame so that image quality in the overlapping regions of the areas can be improved. In contrast, in the claimed inventions each region of the plurality of regions is compressed once in the plurality of frames without using interframe compression. Therefore, Applicant respectfully submits that the cited portions of Iizuka neither disclose nor suggests the claimed inventions of claims 19 and 27. Applicant respectfully submits that the dependent claims are allowable for at least the same

reasons as independent claims 19 and 34. As a result, Applicant respectfully requests that the section 102 be withdrawn.

New claims 42 through 46 have been added. Applicant respectfully submits that these claims are supported by at least pages 13-15 and Figure 7 of the specification as originally filed. Independent claim 42 includes the features of transmitting the one region using a smaller one of the interframe compression and the intraframe compression when the one region has been encoded by intraframe compression within the set number of past frames and transmitting the one region using intraframe compression when the one region has not been encoded by intraframe compression within the set number of past frames. Applicant respectfully submits that Iizuka does not disclose or suggest this feature. Therefore, Applicant respectfully submits that claim 42 is allowable over the cited prior art. In addition, Applicant respectfully submits that the dependent claims are allowable for at least the same reasons as the independent claims.

#### **Rejections under 35 U.S.C. § 103**

Claims 34-41 were rejected under 35 U.S.C. 103(a) as being unpatentable over Iizuka (U.S. Patent No. 5,508,743) in view of Krishnamurthy et al. (U.S. Patent No. 6,304,295). Applicant respectfully traverse this rejection. Claims 34 through 41 have been canceled rendering this rejection moot. Moreover, Applicant submits that none of the cited prior art references individually or in combination suggest the claimed inventions.

In view of the foregoing, Applicant submits that these claims are in condition for allowance. Accordingly, a notice of allowance is respectfully requested. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 749-6900 ext. 6927. If any additional fees are due in

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connection with the filing of this paper, then the Commissioner is authorized to charge such fees to Deposit Account No. 50-0805 (Order No. SUNMP407).

Respectfully submitted,  
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